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Attorneys for BLUE CROSS OF
CALIFORNIA D/B/A ANTHEM BLUE
CROSS AND ANTHEM BLUE CROSS
LIFE AND HEALTH INSURANCE
COMPANY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC; SUNRISE
MOUNTAINVIEW HOSPITAL, INC.; and
SOUTHERN HILLS MEDICAL CENTER,
LLC,

Plaintiffs,

v.

BLUE CROSS OF CALIFORNIA D/B/A
ANTHEM BLUE CROSS; ANTHEM BLUE
CROSS LIFE AND HEALTH INSURANCE
COMPANY; and KEENAN &
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY
Hon.

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS' TIME TO
FILE REPLY IN SUPPORT OF THEIR
MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED COMPLAINT [ECF
NOS. 37 (MOTION); 49 (PLAINTIFFS'
RESPONSE)]**

(SECOND REQUEST)

1 Defendants Blue Cross of California dba Anthem Blue Cross and Anthem Blue Cross Life
2 and Health Insurance Company (collectively, the “Anthem Defendants”) and Plaintiffs Sunrise
3 Hospital and Medical Center, LLC; Sunrise Mountainview Hospital, Inc.; and Southern Hills
4 Medical Center, LLC (“Plaintiffs”) by and through their respective undersigned counsel, hereby
5 stipulate and agree as follows:

6 Plaintiffs’ First Amended Complaint adding the Anthem Defendants to this lawsuit was
7 filed on January 4, 2024. [ECF No. 14]. The Anthem Defendants filed a Motion to Dismiss on
8 February 29, 2024 after receiving one extension. [ECF No. 37.]

9 Plaintiffs’ Response to the Anthem Defendants’ Motion to Dismiss was filed on April 11,
10 2024. [ECF No. 49]

11 The Anthem Defendants’ current deadline to file a reply in support of their Motion to
12 Dismiss is April 18, 2024.

13 The Anthem Defendants require additional time in order to file their reply in support of
14 their Motion to Dismiss to evaluate Plaintiffs’ arguments and due to schedules and other deadlines.

15 The Parties therefore stipulate and agree to extend the deadline for the Anthem Defendants
16 to file their reply until and through May 2, 2024.

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1 This is the Anthem Defendants' second request for an extension. This stipulation is made
2 in good faith and not to delay the proceedings.

3 DATED this 15th day of April 2024.

4 BAILEY KENNEDY

PRHLAW LLC

5 By/s/Joshua M. Dickey

By/s/Charles H. McCrea

6 Joshua M. Dickey

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13 *Attorneys for Defendants Blue Cross of*
14 *California dba Anthem Blue Cross and*
15 *Anthem Blue Cross Life and Health Insurance*
16 *Company*

17 **IT IS SO ORDERED:**

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20 UNITED STATES DISTRICT JUDGE

21 DATED: May 2, 2024